## BINGHAM

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## Via Electronic Filing

Marlene H. Dortch Secretary Federal Communications Commission 445 Twelfth Street, S.W. Washington, D.C. 20554

Re: GN Docket No. 09-191, Preserving the Open Internet; WC Docket No. 07-52, Broadband Industry Practices; WC Docket No. 05-75, Verizon-MCI Transfer of Control; GN Docket No. 10-127, Framework for Broadband Internet Service; and WC Docket No. 03-251, Line Sharing Order and NOI

Dear Ms. Dortch:

On June 28, 2012, Vonage Holdings Corp's ("Vonage") Brendan Kasper, Senior Regulatory Counsel, and the undersigned counsel met with the following Commission staff members to discuss matters relevant to the above-reference proceedings: Jim Bird, Virginia Metallo, and Joel Rabinovitz of the Office of General Counsel; Marius Schwartz, the Commission's Chief Economist; Sarah Whitesell, Jessica Campbell, Martha Heller, and Dana Scherer of the Media Bureau and Eric Ralph of the Wireline Competition Bureau.

In particular, Vonage discussed issues consistent with its previously filed comments in the above-referenced proceedings regarding the Commission's net neutrality order and the importance of prohibiting discrimination by network operators who have the incentive and capability to engage in anticompetitive practices, especially in light of the changes in the wireless and wireline broadband industry. Vonage further addressed concerns regarding the potential misuse of the managed service exception under the Commission's net neutrality rules and the need for unification of provisions related to wireless and wireline providers given the potential for discriminatory conduct to arise based on the current differences between those obligations.

Vonage also discussed Verizon announcement to eliminate standalone DSL service and decreasing availability of standalone DSL or alternative standalone wireline broadband services to U.S. consumers. Vonage encouraged the Commission to reexamine the need for instituting a global requirement for the provision of such service so as to continue to promote competition in the provision of voice and other over-the-top services.

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Respectfully submitted,

/s/

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